

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS,)	
)	
Plaintiff, Counterclaim Defendant,)	
)	C.A. No. 2:19-cv-05030 JDW
v.)	
MIDDLE EAST FORUM,)	
DANIEL PIPES (individually), and)	
GREGG ROMAN (individually),)	
)	
Defendants, Counterclaim Plaintiffs.)	

[PROPOSED] ORDER

AND NOW, this ____ day of _____, 2021, upon consideration of Defendants' Motion *in Limine* to Exclude Evidence of Alleged Prior Bad Acts Concerning Other Litigants and Non-Parties, and Plaintiff's opposition thereto, it is hereby ORDERED that the Motion is GRANTED and (1) evidence and testimony concerning alleged prior bad acts by Defendants directed toward Caitriona Brady, Delaney Yonchek, Patricia McNulty, Marnie O'Brien, Tiffany Lee, Aman Patel, Laura Frank, Lara Scott, Alana Goodman, Samantha Mandalas and any other non-party is EXCLUDED; (2) to the extent any witness lacks first-hand knowledge of Plaintiff's allegations of sex-based hostile work environment, that witness is EXCLUDED, and on these grounds, Caitriona Brady, Delaney Yonchek, Tiffany Lee, Aman Patel, Laura Frank, Lara Scott, Alana Goodman and Samantha Mandalas are EXCLUDED as witnesses at trial;

The Honorable Joshua D. Wolson